

Minutes of the 146th Meeting of the Office for Legal Complaints (OLC)

Wednesday 29 April 2026

Board members present. Ric Blakeway, OLC Chair Elaine Banton Georgina Philippou Rachel Cerfontyne Hari Punchihewa Alison Sansome	In attendance Phil Cain, Chief Ombudsman David Peckham, Head of Operations, Business Transformation and Intelligence Steve Pearson, Deputy Chief Ombudsman Blessing Simango, Head of Finance, Procurement, and ICT Zoe Grainger Head of People Strategy and Culture Mike Harris, Head of Communications, Engagement, and Impact Laura Stroppolo, Head of Programme Management and Assurance Jodie Handley, Interim Deputy Chief Ombudsman, observing all agenda items except item 4 Keara Causer, Interim Senior Customer Experience Manager, item 11 Sally Berlin, Independent Service Complaints Adjudicator, item 11
Apologies: Owen Purcell, Board member	
Minutes: Kay Kershaw, Board Governance Manager	

Item 1 - Welcome, apologies, declarations of interest and other preliminary matters

1. The Chair welcomed attendees.
2. The Board welcomed Ric Blakeway to his first meeting in his capacity as Chair of the OLC Board.
3. The meeting was quorate with a lay majority. Apologies were noted.
4. Legal Ombudsman staff declared an interest in agenda item 4. The Board agreed that the staff observer should recuse themselves for this item; all other staff could remain in attendance. No other conflicts of interest were declared.
5. The Chair changed the agenda order. The minutes reflect the order of discussion.

Item 2 – Update on the 2026/27 Budget Acceptance Criteria and Scheme Transformation

6. The Board received a verbal update on the 2026/27 Budget Acceptance Criteria (BAC) and Scheme Transformation. In discussion the Board noted that:

- The LSB had approved a 6.5% levy increase alongside £900k for Scheme transformation, with £300k released for discovery and £600k contingent on its outcome. Ministerial approval remained outstanding but was progressing without significant concern, with authority to spend granted.
- Governance arrangements and risk mitigations for Scheme Transformation were under development, with a paper to be presented to the Board in July 2026. Indicative delivery costs would be provided in Q4 following completion of discovery to inform 2027/28 budget planning.
- The 2025/26 financial outturn was within the MoJ tolerance.

ACTION: The Executive to present a paper on Scheme transformation governance arrangements at the July Board meeting.

7. The Board **noted** the update on the 2026/27 BAC and Scheme transformation.

Item 3 – Proposed changes to Scheme Rules, case fees and decision transparency

8. The Board discussed proposed changes to the Scheme Rules, case fees, decision transparency and an accompanying consultation document, considering risks, benefits, implementation implications, alignment with other Ombudsman schemes, and overall fairness and inclusivity.
9. Members broadly supported the proposals and draft consultation document, provided recommendations to strengthen them, and emphasised that associated risks should be appropriately reflected in the strategic risk register. Further comments were invited by 8 May 2026.

ACTION: Board members to submit further comments on the Scheme Rules, case fees, decision transparency and consultation document to the Deputy Chief Ombudsman by 8 May 2026.

10. Members requested a benefits realisation framework, setting out outcomes, baselines, gaps, mitigation and indicative trajectories, to be presented alongside consultation responses and final recommendations.

ACTION: The Executive to present the benefits realisation framework alongside consultation responses and final recommendations.

11. The Board **approved** the proposals, subject to consideration of the recommendations made, and delegated final approval of the consultation document to the OLC Chair.

Item 4 –2025/26 Annual Report and Accounts: Update on Progress

12. The Board discussed progress on the 2025/26 Annual Report and Accounts (ARA), noting that delivery remained on track against the planned timetable and aligned with provisional laying dates. The Board also noted that dedicated out-of-committee sessions had been scheduled for members to review and provide feedback on the first draft.
13. 15. The Board **noted** the update the update on the Annual Report and Accounts.

Item 5 – Leadership Structure

14. The Board discussed proposed transitional changes to the leadership structure to support delivery of the Scheme transformation alongside business as usual activity. Members were broadly supportive of the approach, recognising the need to strengthen strategic capacity, enhance organisational alignment, and reduce siloed working.
15. The Board noted how the structure would build capability and resilience at senior leadership level primarily through existing resource, supported by targeted leadership development and clearer role profiles. It was acknowledged that, where required, while maintaining delivery of business-as-usual alongside transformation. If required, additional resource would be provided through fixed-term arrangements.
16. Members emphasised the importance of clear governance arrangements, including defined roles, responsibilities and accountabilities, particularly in relation to risk ownership, business continuity, and communication during the transition.
17. The Board supported the proposed structure as a transitional arrangement, noting that formal approval rests with the Chief Ombudsman and remains subject to MoJ agreement.
18. The Board **noted** the update on leadership structure.

Item 6 –Chief Ombudsman’s Report

19. The Board discussed the Chief Ombudsman’s report, commending sustained performance and organisational resilience in managing increased demand.
20. Members requested high-level updates on cyber risk and activity in future Chief Ombudsman reports, together with clarity on MoJ support and Board communication arrangements in the event of a cyber incident.

ACTION: The Chief Ombudsman to include high level updates on cyber risk and activity in future Chief Ombudsman reports.

ACTION: The Executive to provide clarity on MoJ support and Board communication arrangements in the event of a cyber incident.

21. The Board discussed opportunities to better leverage casework insights to support regulatory objectives and requested dedicated reporting on regulatory objectives as part of future Board agendas.

ACTION: The Executive to introduce dedicated reporting to the Board regulatory objectives.

22. Members noted that the approach to managing mass claims would be considered through the Scheme Transformation.
23. The Chief Ombudsman confirmed that Scheme Transformation updates would be provided through formal governance arrangements once established, and via the Chief Ombudsman’s report in the interim.
24. The Board **noted** the Chief Ombudsman’s report.

Item 7 – Integrated Performance Report

25. The Board discussed the integrated Performance report, noting that work to refresh the strategic scorecard was underway and requesting clearer reporting of case resolution times across each resolution pathway.

ACTION: The Executive to provide clearer reporting of case resolution times across each resolution pathway within the strategic scorecard. A new integrated performance report to be presented in July 2026.

26. It was confirmed that reporting on the new customer satisfaction approach would commence in Q1 2026/27.

27. The Board **noted** the integrated Performance report.

Items 8 – 10 Committee updates

28. The Board **noted** updates from the Remuneration and Nominations Committee, Audit Risk and Assurance Committee, and the Public Interests Decisions Committee, including the following key points:

- A move to a proportionate internal audit assurance approach for 2026/27, supplemented by a thematic review on transformation readiness following the discovery phase. The effectiveness of this approach would be reviewed ahead of agreeing the 2027/28 internal audit programme.
- The potential need to review the frequency of Public Interest Decisions Committee meetings, given the historic backlog of suitable cases had been cleared and cases were now arising from current workload.
- External response to published decisions had been generally positive, with limited challenge. Opportunities to further increase impact and insight were recognised.

29. Members discussed the approach to full decision transparency, including resource and risk implications, improvements being made to decision-writing, the potential use of technology, including AI, and the role of publication in supporting regulatory objectives. The Board requested a paper on readiness for expanded publication, including resourcing implications and the proposed delivery approach to be presented at a future Board meeting.

ACTION: The Executive to present a paper to the Board on readiness for expanded publication of ombudsman decisions at a future Board meeting.

Item 11 – Previous minutes and actions and matters arising.

30. The Board approved the minutes of the ARAC meeting held on 6 October 2025 and the minutes of RemCo meetings held on 20 November and 16 December 2025 for publication and noted an update on previous actions.

ACTION: The Board Governance Manager to arrange for the minutes of the ARAC meeting held on 6 October 2025 and the minutes of RemCo meetings held on 20 November and 16 December 2025 to be published.

Item 12 – 2026 Board effectiveness review

31. The Board discussed the approach to the 2026 Board effectiveness review, noting that it would take account of themes from annual Board member appraisals conducted earlier in the year and a forthcoming questionnaire to be issued to the Board and Executive.
32. Members discussed Board composition and future recruitment, noting plans to appoint a new non-lay member and the need to consider skill requirements, particularly to support effective oversight of Scheme transformation.
33. There was support for incorporating a more forward-looking assessment of Board readiness for Scheme transformation within GIAA's thematic review, alongside more regular opportunities for the Board to self-reflect on its ability to provide effective challenge.
34. The Board **noted** the update on the 2026 Board effectiveness review.

Item 13 – Transparency publications reports

35. The Board approved the publication of the Q4 transparency reports, noting that there were no entries on the gifts and hospitality register during this period.

ACTION: The Board Governance Manager to arrange for the Q4 transparency reports to be published.

36. The Board sought clarification on whether members must declare whether their other roles were remunerated within the register of interests.

ACTION: The Board Governance Manager to clarify whether Board members must declare on the register of interests whether their other roles are remunerated.

Item 14 – Redactions and non-disclosure report

37. The Board **noted** the redactions and non-disclosure report and **approved** the items identified for redaction and non-disclosure in the April Board pack.

ACTION: The Board Governance Manager to arrange for the April Board papers to be published in line with the redactions and non-disclosures approved by the Board.

38. The Board agreed that the redactions and non-disclosure report could be discontinued as the relevant information was now clearly set out within individual papers.

Item 15 - Voluntary assurance letter

39. The Board discussed and agreed a revised format for the voluntary assurance letter to the LSB after each Board meeting.
40. The Board **agreed** that the Executive should review the basis and governance of sharing Board papers with the LSB and MoJ, including the data protection considerations.

ACTION: The Executive to review arrangements for sharing Board papers with the LSB and MoJ.

Item 16 - Service Complaint Adjudicator's Annual Report

41. The Board discussed the Service Complaint Adjudicator's (SCA) annual report, noting that recommendations were being progressed and that learning from the service complaints process supported continuous improvement.
42. Service complaint volumes were low relative to overall case volumes and were broadly consistent with comparable organisations, with themes aligned to those seen elsewhere and no evidence of systemic cultural issues.
43. The Board discussed how assurance and reporting on performance and customer experience could be strengthened, including through expanding the SCA's Terms of Reference to enable broader thematic or dip-sample reviews; triangulating qualitative and thematic insight against wider customer experience data; and clearer assurance on the implementation and impact of improvement actions.

ACTION: The Executive to review and propose how assurance and Board reporting on performance and customer experience could be strengthened, including options for expanding the SCA's Terms of Reference to enable broader thematic or dip-sample reviews; triangulating qualitative and thematic insight against wider customer experience data; and clearer assurance on the implementation and impact of improvement actions.

44. The Board discussed the definition of an aged case, the approach to its investigation and the importance of ensuring customers are kept informed of progress.
45. The Board **noted** the SCA's annual report and thanked the Adjudicator for the insight provided.

Item 17 – Board effectiveness

46. The Board reflected on the effectiveness of the meeting, noting the value of open and constructive discussion and the importance of maintaining a strategic, conversational approach.
47. Members discussed opportunities to refine the structure of future Board agendas, including reviewing the frequency and format of standing items, making greater use of items for note or consent, and ensuring sufficient time for strategic discussion, particularly in relation to Scheme Transformation.

Item 11 – Any other business

48. The Board discussed arrangements for upcoming meetings, including holding the June meeting in person to support strategic discussions.
49. There was no other business discussed.